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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TINISHA PRICE

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

)
) Case No. 2:17-cv-00755-JCM-VCF
)

) **JOINT STIPULATION FOR EXTENSION OF**
) **TIME TO FILE DEFENDANT'S NOTICE OF**
) **VOLUNTARY REMAND OF THE CASE OR**
) **CROSS-MOTION TO AFFIRM**

) **(Second Request)**
)

1 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
2 the time for responding to Plaintiff's Motion for Summary Judgment be extended for approximately
3 two weeks from August 31, 2017 to **September 15, 2017**. This is Defendant's second request for
4 extension. Good cause exists to grant Defendant's request for extension. Additional time is required
5 as Counsel for Defendant (Counsel) has over 50+ active matters, of which two dispositive motions per
6 week until the early October. Counsel has been on intermittent medical leave due to her chronic
7 migraines and daily recurrent headaches. As a result of unanticipated medical leave, Counsel became
8 behind on her caseload. As such, Counsel respectfully requests additional time in order to address the
9 issues raised in Plaintiff's Motion. Defendant makes this request in good faith with no intention to
10 unduly delay the proceedings. Plaintiff has no objection to the requested relief.
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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

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3 Respectfully submitted,

4 Date: August 29, 2017

5 By: /s/ Cyrus Safa
6 CYRUS SAFA
*by email authorization on 8/29/17
Attorney for Plaintiff

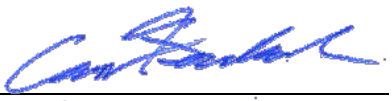
7 Date: August 29, 2017

8 STEVEN W. MYHRE
Acting United States Attorney

9 By: /s/ Tina L. Naicker
10 TINA L. NAICKER
11 Special Assistant United States Attorney

12 **IT IS SO ORDERED.**

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15 DATE: August 29, 2017

16 
17 THE HONORABLE CAM FERENBACH
18 United States Magistrate Judge
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1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF**
4 **VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM**

5 on the date and via the method of service identified below:

6 **CM/ECF:**

7
8 Cyrus Safa
9 Attorney at Law: 13241
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16
17 Gerald M. Welt
18 Attorney at Law: 1575
19 703 S. Eight St.
20 Las Vegas, NV 89101
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23
24 Respectfully submitted this 29th day of August 2017,

25 /s/ Tina L. Naicker
26 TINA L. NAICKER
Special Assistant United States Attorney